

Airedale

Bi The evidence presented in both the Strategic Housing Needs Assessment and the Affordable Housing Study (AHEVA) that underpin the Draft shows that there is little to justify the release of land in Silsden. The SHMA presents scant evidence of substantial housing need in the area. It also shows that building large numbers of homes in the town would not address the need for affordable housing in Silsden nor the district. It would deliver housing at the wrong price in the wrong place. This increases was suddenly presented without further inquiry after the results of the developers challenge on the habitats regulations assessment. Areas of central Bradford are identified as having the greatest need for new housing whereas Silsden has a specific but limited local need. The department for the environment states that "Sustainable development makes it possible for people to live close to their work and within communities that can provide for their needs locally". Therefore for the LDF to be sustainable, houses required for Bradford should be provided within the city or its environs rather than over provision at the geographic extreme of the district. It is felt that the figures have little to do with the individual areas needs and are just a reshuffling of the numbers for the benefit of Bradford and developers.

Bii. Additional housing will require greenbelt deletion and therefore properly reflect green belt policy as it stands and no consultation has been mooted.

The flooding of Dec 2015 highlights a need for strategic approach prior to any increase to housing stock. It has become apparent since these floods that Bradford and the EA do not have data on who and how extensive the flooding was nor what were the main factors in this flooding. Other than the recent push by Bradford to get communities to adopt and run their own flooding prevention and action group voluntarily there appears to be no movement toward the strategic approach require bearing in mind the majority of land allocation in Silsden according to the SHLAA is in the flood risk areas.

Whilst there has been a 20% increase in the proposed housing allocation, there has been no revisions made to the local infrastructure plan regarding the specific needs of Silsden. The LIP [Local infrastructure plan] identifies utilities and transport as issues that could pose significant challenges to delivering housing. The LIP also identifies Flood risk, Drainage and Education as areas where work is required to ensure no significant risk is imposed section 5.4.1 Utilities section 5.4.3.1 identifies a constraint regarding northern power grids primary substation at Silsden. Properties built in the region of 100 dwellings will require improvement to the 11KV secondary substations; properties in the region of the suggested 1000 will require major upgrade to the 33KV primary substation – we aware that already there are some 300+ dwellings within application for Silsden alone and also that this substation covers a much wider area which also have large applications pending. At the moment the electric companies are talking of a time scale between 10-15 years before upgrading.

Section 5.4.3.3 confirms that Yorkshire Water cannot accepted any new foul or surface water flows to the Aire valley trunk sewer from all the areas it serves. Any increase in flows will create an unacceptable risk in pollution also identified by the EA.

Education 5.4.6 identifies the equivalent of 1110 primary places and 952 secondary places in the Aire valley as the population stands at present and there is no planning to address the up and coming shortfall in secondary school places.

The overall plan diagram indicates a “quality bus corridor” between Ilkley and Steeton together with an eastern bypass for Silsden. Which is only likely to provide minimal improved potential to access rail stations in Ilkley and Steeton. The commuting distance and time to places of work would still be excessive.

There is likely to be a significant increase in traffic onto the A629 and A65, particularly at peak times, with further traffic congestion through Silsden, Keighley and Ilkley causing a detrimental effect on the town.

Parking within the town of Silsden is currently a problem, with limited parking areas and a constricted Main Street where on-street parking is the norm, in order to sustain town shops and businesses and as an adhoc method of slowing traffic. Parking at Silsden and Steeton railway station – particularly long-term – is an increasing problem and will be further aggravated by an increase in commuter traffic parking to access rail links to places of work, especially Leeds and Bradford.

Biii The majority of land allocated in the Silsden area is either Green Belt land or protected land with very little Brown field sites, predominately because this is the nature of a small rural town and in order from Bradford to meet a deliverable balance and meet government policy on brown field development they need to move some of the housing allocation from Silsden and the surrounding area's to Bradford central, which will also act as a force towards proper regeneration.